

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, *as assignee of individuals who are Covered Persons*, JANE DOE-1, *a law enforcement officer*, JANE DOE-2, *a law enforcement officer*, EDWIN MADONADO, SCOTT MALONEY, JUSTYNA MALONEY, and WILLIAM SULLIVAN,

Plaintiffs,

v.

BABEL STREET INC., RICHARD ROES 1-10, *fictitious names of unknown individuals* and ABC COMPANIES 1-10, *fictitious names of unknown entities*,

Defendants.

Civil Action No. No. 1:24-cv-10596

Honorable Harvey Bartle III

**NOTICE OF MOTION FOR THE
PRO HAC VICE ADMISSION OF
JORDAN S. JOACHIM, ESQ.**

PLEASE TAKE NOTICE that on a date to be determined by the Court the undersigned counsel for Defendant Babel Street, Inc. (hereafter “Defendant”), shall apply for an Order, pursuant to Local Civil Rule 101.1(c), granting Jordan S. Joachim, Esq., admission to the Bar of this Court *pro hac vice* for the purpose of participating in this matter; said application shall be made before the Honorable Harvey Bartle III, at the United States District Courthouse for the Eastern District

of Pennsylvania, 16614 U.S. Courthouse 601 Market Street, Philadelphia, Pennsylvania 19106.

PLEASE TAKE FURTHER NOTICE that in support of this application, Defendant shall rely upon the Certification of David A. Luttinger, Jr., Esq., and the Certification of Jordan S. Joachim, Esq., which are being filed simultaneously herewith. No brief is necessary because the law in this area is well settled;

PLEASE TAKE FURTHER NOTICE that unless oral argument is requested by the Court, this motion is submitted on the papers pursuant to Fed. R. Civ. Proc. 78; and oral argument is hereby waived; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order admitting Jordan S. Joachim, Esq., *pro hac vice* is submitted herewith.

Dated: December 4, 2024

/s/ David A. Luttinger, Jr.
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